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*Counsel for Various Mesothelioma Talc Claimants*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,  
  
Debtor.

Chapter 11

Case No. 23-12825 (MBK)

Judge: Michael B. Kaplan

**AFFIDAVIT OF LEAH C. KAGAN, ESQ. IN SUPPORT OF AN  
APPLICATION FOR AN ORDER FOR ADMISSION *PRO HAC VICE***

STATE OF NEW YORK                    )  
COUNTY OF NEW YORK                )

I, Leah C. Kagan being of full age and sworn according to law, depose and say:

1. I am an attorney admitted to practice in the United States District Court, District of New Jersey having been admitted in 2009.

2. This Affidavit is being submitted in connection with the application by Jeffrey Simon for admission *pro hac vice* pursuant to D.N.J. L.Civ. R. 101.1 and D.N.J. LBR 9010-1.

3. Mr. Simon has been associated with the law firm Simon Greenstone Panatier, P.C., attorneys for Various Talc Claimants. I have worked on several cases with Mr. Simon pending in various jurisdictions.

4. I believe that Mr. Simon is of high moral character. He is an experienced attorney in asbestos litigation and has tried numerous cases throughout the country. Based upon my

interactions with him, I believe him to be a qualified and capable attorney.

Dated: New York, New York  
April 18, 2023

Respectfully submitted,

/s/ Leah C. Kagan  
Leah C. Kagan, Esq.  
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